



STATE OF WASHINGTON

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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Ref. No. 4-1319

September 29, 2000

RSPA-98-4957-26

Dockets Facility
U.S. Department of Transportation
Room PL – 401
400 Seventh Street, SW
Washington, DC 20590-0001

Dear Sir or Madam:

Subject: Docket No. RSPA –98-4957; Notice 19 Incident & Annual Reports

The Washington Utilities and Transportation Commission (Commission) supports the proposed changes to forms RSPA F 7100.2 Incident Report and RSPA F 7100.2 Annual Report forms. The additional information collected will enhance pipeline companies, federal, and state pipeline safety programs. The data will provide information for analyzing trends in leaks and incidents. The Commission suggests that the information be available on the Federal Office of Pipeline Safety Web page.

Also the Commission staff supports additional data collection on the **Incident Report Form** as follows:

- Third Party Damage Was the pipeline marks accurate?
Operator Fail to mark within the required time?
Caused by Pipeline Company?
Caused by Third Party Excavator?
- Construction Defects Poor Workmanship
Procedures not followed
Poor Construction Procedures

The Commission staff supports additional data collection on the **Annual Report Form** as follows:

- Miles of Pipeline Add a separate line for Wrought Iron
Add a separate line for Cast Iron



- Diameter of Pipe Add a separate line for each diameter above 4 inches
- Cause of Leaks Provide a separate entry for Third Party Damage:
 - Caused by Pipeline Company
 - Caused by Third Party ExcavatorConstruction defect caused by poor construction:
 - i.e. Dents, Gouges, Wrinkles, Bends
- Safety Related Condition Add a line for annual reporting of all safety related conditions, multi errors, or near misses caused by the operator that are factors contributing to leaks and accidents. This data will provide a greater understanding of accident cause and prevention.
- Overpressure Add a line for reports of all overpressure conditions.

Thank you for this opportunity to comment on the proposed changes to the gas transmission and gathering pipeline incident and annual report forms.

If you have any questions regarding this letter please contact Dennis E. Lloyd, Pipeline Safety Engineer, at (360) 664-1319.

Sincerely,



Carole J. Washburn
Executive Secretary